

(4)

United States District Court

EASTERN

DISTRICT

OF MICHIGAN

UNITED STATES OF AMERICA

V.

Sherry Thompson

CRIMINAL COMPLAINT

Case: 2:11-mj-30628
 Judge: Unassigned,
 Filed: 11-23-2011 At 10:47 AM
 USA V. THOMPSON (CMP)(MRM)

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From on or about September 2006 to March 2008 in Wayne County, in the Eastern District of Michigan defendant(s) did, (Track Statutory Language of Offense)

Embezzle, steal, and unlawfully and willfully abstract and convert to her own use funds of the Security Police, Fire Professionals of America, Local 121; and knowingly and willfully filed a false annual financial report and made false entries in records required to be kept.

in violation of Titles 29 United States Code, Section(s) 501(c), 439(b), and 439(c).

I further state that I am a(n) Investigator and that this complaint is based on the following facts:
Official Title

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Mildred S. Holmes
 Signature of Complainant

MARK A. RANDON
 UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

Signature of Judicial Officer

Sworn to before me and subscribed in my presence,

11/23/11

Detroit, MI

10:45a
at

Date

City and State

*UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN*

Sherry Thompson DOB: xx/xx/1970, SSN xxx-xx-6057

**AFFIDAVIT OF
INVESTIGATOR**

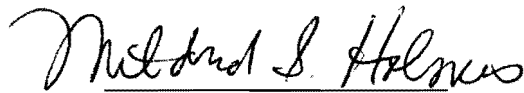
Mildred S. Holmes, Investigator

CITY OF DETROIT
STATE OF MICHIGAN

I, Mildred S. Holmes, declare the following under penalty of perjury:

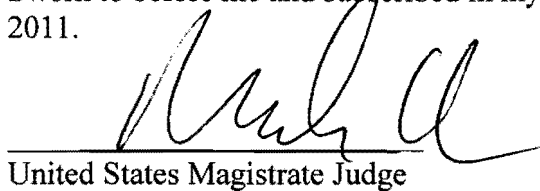
1. I am an Investigator for the United States Department of Labor, Office of Labor-Management Standards. I am assigned to the Detroit District Office at 211 W. Fort Street, Suite 1313, Detroit, MI 48226. I have served with United States Department of Labor, Office of Labor-Management Standards since June 2004. This affidavit is submitted in support of a finding of probable cause and therefore is only a summary of the facts known to me.
2. Thompson joined SPFPA Local 121 in 2004 when she gained employment with the Wackenhut Corporation. She was appointed financial secretary of the local in early 2006 by a Union representative. As financial secretary, Thompson was responsible for maintaining the local's financial books and records.
3. During the period covering September 2006 through March 2008, Sherry Thompson wrote unauthorized checks to herself to which she was not entitled totaling \$9,723.62. Thompson acknowledged that she used Local 121 funds for personal benefit
4. On or about January 24, 2007, Thompson wrote a check in the amount of \$500 for a friend without authorization. Thompson stated that the funds were used for her friend's personal benefit.
5. From on or about November 20, 2006, through on or about December 21, 2007, Sherry Thompson made unauthorized cash withdrawals from Local 121's checking and money market accounts totaling \$7,355.00 for personal benefit.

6. During the period covering November 2006 through October 2007, Sherry Thompson falsified union records required to be kept, in that, she wrote the false purpose of "lost time" on some of the checks made out to herself to conceal that the payments were unauthorized.
7. On or about October 30, 2007, Sherry Thompson filed a false annual financial report with the Office of Labor Management and Standards ("OLMS"), in that, she intentionally did not report the unauthorized funds that she received on Local 121's financial report for the fiscal year ending on March 31, 2007.
8. On June 20 and 24, 2011, and July 14, 2011, Sherry Thompson, after being informed of her rights, admitted to the above misconduct during interviews with the affiant.



Mildred S. Holmes, Investigator
U.S. Department of Labor
Office of Labor Management Standards
211 W. Fort Street, Suite 1313
Detroit, MI 48226

Sworn to before me and subscribed in my presence this 23 day of Nov.,
2011.


United States Magistrate Judge

11/23/11
Date